

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13

BOBBY JOE GREEN
SUSAN R. GREEN

CASE NO. 15-51529-KMS

OBJECTION TO SECURED CLAIM AND OTHER RELIEF

The Debtor(s), by and through counsel, object(s) to the following pre-petition secured claim and moves the Court to determine the treatment of the following collateral for the purposes of plan confirmation:

Freedom Road Financial
10509 Professional Circle
Suite 202
Reno, NV 89521

Description of Collateral: 2007 Yamaha motorcycle

Alleged Amount of Debt Due: \$6,000.00

Treatment: Pay the alleged **amount owed** of \$6,000.00 plus 5% interest over the life of the plan, or, in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of this creditor evidencing a purchase money security interest and that the vehicle loan was acquired less than 910 days before the petition filing, pay the amount owed as set forth in such claim plus 5% interest over the life of the Chapter 13 plan, or, in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of this creditor evidencing a purchase money security interest and that the vehicle loan was acquired more than 910 days before the petition filing, then pay the value of \$6,000.00 plus 5% interest over the life of the plan unless the amount owed as set forth in such claim is less than the value of \$6,000.00.

Debtor(s) pray(s) that in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of the abovementioned creditor evidencing an unsecured interest, that said creditor be paid the same percentage distribution as all other unsecured creditors through the Chapter 13 plan and further pray that either upon payment of the underlying debts determined under non-bankruptcy law or a discharge under Bankruptcy Code 1328, all liens be cancelled and any and all title documents be promptly delivered to Debtor.

THIS the 28th day of September, 2015.

/S/EDWIN F. TULLOS
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